

**AMENDMENTS TO THE DRAWINGS**

The attached sheets of FORMAL drawings includes Figures 1-3 for replacement of the informal drawings of Figures 1-3 submitted at the filing of this application

No changes have been made in the replaced formal drawings with respect ot the filed informal drawings.

Attachment: Replacement Sheet(s)

### **REMARKS/ARGUMENTS**

Reconsideration of this application is respectfully requested.

#### ***Drawings***

In accordance with the Examiner's request under 37 CFR 1.12(d), the formal drawings without changes with respect to the originally filed informal drawings, are attached hereto.

#### ***Claim Rejections – 35 USC § 103***

Under 35 USC 103(a), the Examiner has rejected claims 1-13 on the grounds of obviousness over Rusu (US 4,711,615) in view of Halliday (US 3,486,478). The Examiner has further alleged that Rusu teaches a method for obtaining rotational power from a driving shaft to drive a pump of an aircraft system but lacks the specific teachings of the details of the transmission (the gear set), and that Halliday teaches first and second bevel gear configurations. The Examiner has further alleged that it is obvious to modify Rusu to employ a gear set of preferred configuration depending on direction of input in view of Halliday, in order to provide a pump actuating means, while saving lateral space within the aircraft structure.

Applicant cannot agree with the Examiner.

#### **The MPEP states in 706.02(j) Contents of a 35 U.S.C. 103 Rejection:**

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations...

The initial burden is on the examiner to provide some suggestion of the desirability of doing what the inventor has done...

The Examiner has provided no grounds to establish a *prima facie* case of obviousness against the claimed invention.

Rusu teaches an overspeed protection system provided for a turboprop engine which includes a governor pump and a constant speed governor, both being driven by the turbine through a gear reduction assembly. Rusu addresses an overspeed protection issue regarding the governor pump in operation but does not mention, or even imply, any issue relating to change in the rotational direction of the turbine, which is a design concept rather than an operation issue. Therefore, there is no motivation or suggestion in Rusu to solve a problem resulting from change of the rotational direction of a turbine or a bearing shaft.

Halliday teaches a steerable marine drive which has coaxial first and second driving shafts coupled to respective first and second bevel gears which simultaneously gear a third bevel gear to drive a driven shaft and a propeller connected thereto. The first and second driving shafts simultaneously rotate in opposite directions in a normal operation, to drive the propeller

in a torque balanced condition. When steering needs to be provided, the propeller is driven by either one of the first or second driving shafts.

The Examiner has in fact failed to show any suggestion or motivation in either of the cited references to use Halliday to modify Rusu for the "desirability of doing what the inventor has done". The rejection is defective for this reason.

Furthermore, Halliday's teaching is in a field of marine vessels which is far away from the technical field of aircraft driving systems, and does not suggest or even imply use of his teachings to modify an aircraft driving system. On what basis does the Examiner allege that the skilled reader would be led to combine an overspeed protection system with a steerable marine drive in order to yield the claimed apparatus from driving an aircraft pump system? None has been suggested, and thus the rejection is also defective for this reason.


Furthermore, the combination of Rusu and Halliday does not teach or suggest all the claim limitations. Therefore, the rejection is thus also defective for this reason, as well.

Therefore, the Examiner's rejection of claims 1-14 is traversed.

No new subject matter has been added.

It is believed that this application is in condition for immediate allowance Favourable reconsideration and early issuance of the Notice of Allowance are respectfully solicited.

Respectfully submitted,

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## **APPENDIX A**